CONSUMERS ILLINOIS WATER COMPANY
RESPONSES TO ILLINOIS COMMERCE COMMISSION
DATA REQUEST WD-1.01
DOCKET NO. 01-0606
NOVEMBER 1, 2001
WITNESS RESPONSIBLE: Thomas J. Bunosky

WD-1.01 a) Please provide the total amount of acreage involved to construct the proposed main extension to Large Scale Distribution Generation (LSDG) facility.

b) Please provide a breakdown, by acreage, of the current use of the acreage involved with this proceeding e.g.: residential, agriculture, pasture and public.

c) Please provide the amount of acreage that may be removed from current use due to a permanent structure being installed, such as a meter vault.

d) Please provide the amount of acreage that will be required for working easements during the construction of the different main extensions. Provide the width of the working easement.

e) Please provide the amount of acreage that will be required for permanent easements. Provide the width of the easement.

f.) Please provide the total number of easements required to be obtained to complete the main extension. Provide the names of the landowners of the easements that CIWC will need to acquire.

g) If CIWC is acquiring easements, please provide the latest status of obtaining easements from each owner of property along the proposed main extensions.

Answer: a) The total amount of acreage involved to construct the proposed main extension to LSDG facility is 1.65 Acres.

b) The breakdown, by acreage, of the current use of the acreage involved with this proceeding is as follows:

Railroad	0.10 Acres
Highway	0.10 Acres
Residential	0.04 Acres
Pasture	0.62 Acres
Agriculture	0.65 Acres
Woodland	0.14 Acres

c) The amount of acreage that would be removed from its current use due to a permanent structure being installed for the main extension is 0034 Acres, which will be used to construct a valve vault.

d) The amount of acreage required for working easements during the construction of the main extension is 1.09 Acres. The width of the working easements is 15 ft.

e) The amount of acreage that will be required for permanent easements is 1.50 Acres. The width of the permanent easement is 20 ft.

f) The total number of easements required to be obtained for the main extension is three. The names of the landowners of the easements that CIWC will need to acquire are as follows:

Lewis Manilow
James and Beverly Stuewe
Governors State University – Dr. Stuart Fagan, President

g) The landowners have not been contacted to date with regard to obtaining easements.

CONSUMERS ILLINOIS WATER COMPANY
RESPONSES TO ILLINOIS COMMERCE COMMISSION
DATA REQUEST WD-1.11
DOCKET NO. 01-0606
NOVEMBER 1, 2001
WITNESS RESPONSIBLE: THOMAS J. BUNOSKY

WD-1.11 Please provide a diagram of the above existing plant with the capacity addition(s) for the LSDG generating station.

Answer: Please refer to Exhibit WD 1.10 for the proposed additional storage reservoir with a capacity of 1.5 million gallons. Larger pumps will be installed in the booster station to increase the pumping capacity of the station. Currently there is a single variable speed pump at the station with a capacity of 1,000 gpm, and two constant speed pumps with a capacity of 2,000 gpm each. The variable speed pump and one of the constant speed pumps will be replaced with two variable speed pumps with a capacity of 2,000 gpm each.

Water supply (well) capacity will be increase by the development of Well No. 5. Well No. 5, which is currently capped, will be equipped with a 1,200 gpm pump. Well No. 5 is shown on the distribution system map, Exhibit WD 1.03. The site on which Well No. 5 is located is shown on Exhibit WD 1.11, attached.

PLAT OF SURVEY

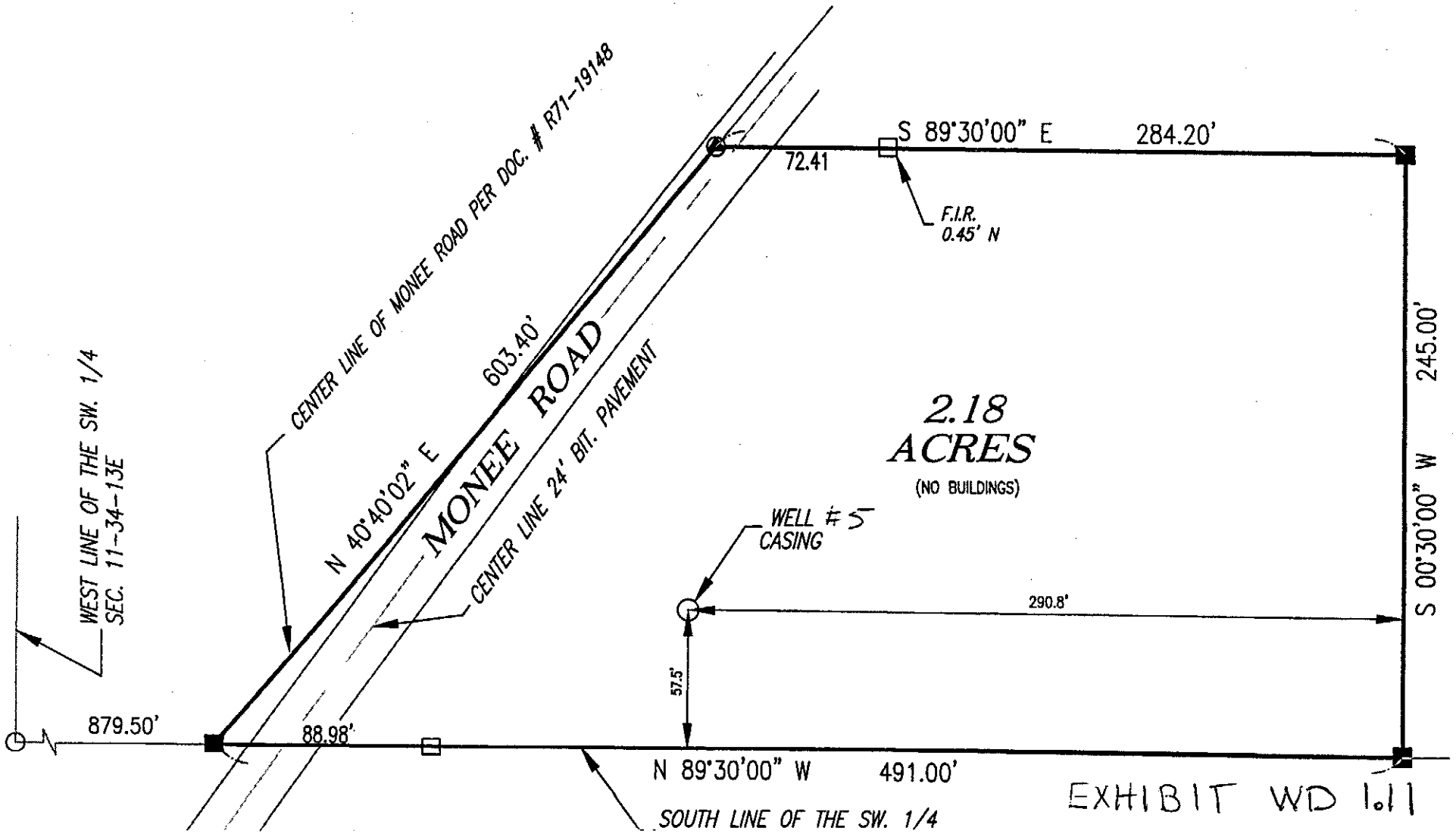

EXHIBIT WD 1.11

CONSUMERS ILLINOIS WATER COMPANY
RESPONSES TO ILLINOIS COMMERCE COMMISSION
DATA REQUEST WD-1.12
DOCKET NO. 01-0606
NOVEMBER 1, 2001
WITNESS RESPONSIBLE: THOMAS J. BUNOSKY

WD-1.12 Provide workpapers, memorandums and notes that support Mr. Bunosky's statement, on page 5 of Exhibit 1.00, lines 2 thru 4 "... extensive additions to the existing plant of CIWC's University Park Division, including new water transmission main and additions to supply plant, will be required."

Answer: The attached design notes support Mr. Bunosky's statement regarding the extensive additions required to the existing plant of the University Park Division. The calculations show that with the addition of the LSDG plant that additional well supply, booster pumping, storage, and water transmission main will be required. The addition of the LSDG plant will bring the projected maximum day demand for the industrial system to 1,700 gpm. In the industrial system, with the largest well out of service, the well supply capacity, the firm capacity, is only 800 gpm. Consequently, there is a deficit of 900 gpm in the firm well pumping capacity with the LSDG plant addition.

The peak hour capacity will increase even higher than the maximum day demand to around 2,000 gpm with the addition of the LSDG plant. This demand must be met by the variable speed pumping since the industrial system demands are met with the booster pumps during the demand periods other than fire demand. Since the demand will frequently exceed the variable speed pump capacity of 1.000 gpm, it must be replaced with a larger capacity variable speed pump, and a back-up variable speed pump of equal size is required for reliability.

The design notes illustrate that with the addition of the LSDG plant there will be a deficit of 1.3 million gallons (MG) in storage in the combined University Park industrial and residential system. This is assuming the storage capacity of an average day demand as recommended by Illinois Environmental Protection Agency (IEPA). The maximum operating water demands of the generating plants was used in addition to the remaining system average day demand to calculate this storage requirement. The proposed plan is to construct an additional 1.5 MG storage reservoir identical to the existing tank.

The transmission main will allow the additional well capacity to be connected to the industrial system, thus allowing the distribution system to meet the increased demands of the LSDG plant. Well No. 5 is located on the residential system, which is currently not connected to the industrial system. The proposed 20" main on Stuenkel Road will connect Well No. 5 as well provide back-up well capacity to the industrial park with the

addition of Well No. 1 and Well No. 2. The control valve vault will allow water to flow from the "residential" to the "industrial" system, or vice versa depending on the demands of the system.

PPL Global Water & Sewer
DZO 4/13/01

PPL Demands		8/29/01
Water:	600 gpm	800 gpm
Sewer:	120 gpm	250 gpm

Location @ Industrial Drive

Existing Mains
12" Water Main (dead end)
10" Gravity Sewer

Existing Lift Station
Cresco Metals : 170 gpm cap.
6" Force Main

Water Supply / Facilities Needed

- Industrial Supply Demands *
  * Projections from Tyson Report
  Includes Industrial + Unincorp. Twp

	$Q_{AVG\ DAY}$	$Q_{MAX\ DAY}$ *
2000	0.267	0.464 MGD
2020	0.612	1.065 MGD

* Avg Day x 1.74

Max Day Demand – Industrial Park

Current 0.464 MGD ⇒ 322 gpm

10W 108 gpm Constellation Power ⇒ 434 gpm

Current Well Pump Cap. / Safe Yield

	Pump Cap.	Safe Yield
Well # 3 *	~~1000~~ ~~720~~ (?)	1,200 gpm?
Well # 6	~~900~~ ~~600~~ (?)	~~649~~ gpm?

* Tyson reports ^ 1,000 gpm & pump equip records ÷ ICC report says 720

Additional Demand to Max Day:

PPL Energy	~~900~~ ~~600~~ gpm
Growth Say 0.2 MGD	140 gpm
	1,696
Indr + PPL + Const TOTAL	~~1496~~ gpm
Say	~~1700~~ ~~1500~~ gpm

Current Firm capacity = 800 gpm

Deficity in Firm Cap. = 900 gpm

∴ Construct Dralle Road 20" Interconn. & Upgrade Well No. 5

or Construct Stuenkel Road 20" Interconn & Upgrade Well No. 5

Storage Requirements

Say Avg Day Demand needed Ideally. With interconnect include industrial + residential

Avg Day Demand Indr. + Res.

2000 ~~Q AVG DAY~~

Current/ 1.11 MGD ← Use this ⇒ 1.11 MGD.

2020 2.30 MGD

~~Assume~~ Use power plants average day when they are running

Indr Q_{AVE} = 0.267 MGD

Constellation = 0.620

Total = 0.887

< 1.5 MG Ok

Constellation @ 434 gpm ⇒ 0.62 MGD

PPL @ ~~600~~ 800 gpm ⇒ ~~0.86~~ 1.15 MGD

Growth 0.20 MGD

Total = ~~2.79~~ 3.09 MGD

Required Storage ~~2.0~~ 3.1 MG

Existing Storage

Standpipe = 1.5 MG

Elevated = 0.3 MG

1.8 MG

Deficit ~~1.0~~ 1.3 MG

⇒ Add 1.5 MG Storage

CONSUMERS ILLINOIS WATER COMPANY
RESPONSES TO ILLINOIS COMMERCE COMMISSION
DATA REQUEST WD-1.18
DOCKET NO. 01-0606
NOVEMBER 1, 2001
WITNESS RESPONSIBLE: THOMAS J. BUNOSKY (CIWC Response Only)

WD-1.18 Please provide the construction schedule for the main extension and the generating plant.

Answer: The construction schedule for the main extension calls for construction to start on April 1, 2002, and to be complete by May 15, 2002.

LSDG will provide an additional response regarding the generating plant under separate cover.

CONSUMERS ILLINOIS WATER COMPANY
RESPONSES TO ILLINOIS COMMERCE COMMISSION
DATA REQUEST WD-1.20
DOCKET NO. 01-0606
NOVEMBER 1, 2001
WITNESS RESPONSIBLE: THOMAS J. BUNOSKY

WD-1.20 Please provide the purpose of and justification for excluding certain sections on University Park's rules, regulations and condition of service, as set forth in Exhibit E. (Please provide all workpapers and supporting documentation.)

Answer: The sections that were excluded are areas that are covered in the Water Supply Agreement. LSDG requested during negotiation of the Water Supply Agreement that the areas that did not pertain to LSDG, or the areas that were already covered in the Water Supply Agreement be listed in Exhibit E. The reason for their request was to not cause confusion in the future as to the intent of the Water Supply Agreement. There are no workpapers or supporting documentation.

CONSUMERS ILLINOIS WATER COMPANY
RESPONSES TO ILLINOIS COMMERCE COMMISSION
DATA REQUEST WD-1.21
DOCKET NO. 01-0606
NOVEMBER 1, 2001
WITNESS RESPONSIBLE: THOMAS J. BUNOSKY

WD-1.21 Please provide the rated capacity of the current water facilities and the proposed water facilities addition(s).

Answer: Please refer to the responses to WD 1.11 and WD 1.12 above.

CONSUMERS ILLINOIS WATER COMPANY
RESPONSES TO ILLINOIS COMMERCE COMMISSION
DATA REQUEST WD-1.24
DOCKET NO. 01-0606
NOVEMBER 1, 2001
WITNESS RESPONSIBLE: THOMAS J. BUNOSKY

WD-1.24 Please describe in detail how CIWC plans to provide 100 gpm by the effective date.

Answer: CIWC plans to provide 100 gpm by the effective date by providing service from the existing 12 in. main on Industrial Drive at the entrance to the LSDG plant.

CONSUMERS ILLINOIS WATER COMPANY
RESPONSES TO ILLINOIS COMMERCE COMMISSION
DATA REQUEST WD-1.25
DOCKET NO. 01-0606
NOVEMBER 1, 2001
WITNESS RESPONSIBLE: THOMAS J. BUNOSKY

WD-1.25 Please describe in detail how CIWC plans to provide 400 gpm by June 1, 2002.

Answer: CIWC plans to have the following water system improvements completed by June 1, 2002 in order to provide 400 gpm: the booster pump station will be upgraded, Well No. 5 will be developed and put on line, the 1.5 MG reservoir will be erected and in service, and the transmission main on Stuenkel Road will be installed and in service. The critical facilities needed to meet the 400 gpm addition to the system are the upgraded booster station and the 20" transmission main. However, all facilities are planned to be completed by June 1, 2002.

CONSUMERS ILLINOIS WATER COMPANY
RESPONSES TO ILLINOIS COMMERCE COMMISSION
DATA REQUEST WD-1.26
DOCKET NO. 01-0606
NOVEMBER 1, 2001
WITNESS RESPONSIBLE: THOMAS J. BUNOSKY

WD-1.26 Please describe in detail how CIWC plans to provide 800 gpm by July 1, 2002.

Answer: CIWC plans to have the following water system improvements completed by June 1, 2002 in order to provide 800 gpm: the booster pump station will be upgraded, Well No. 5 will be developed and put on line, the 1.5 MG reservoir will be erected and in service, and the transmission main on Stuenkel Road will be installed and in service.

CONSUMERS ILLINOIS WATER COMPANY
RESPONSES TO ILLINOIS COMMERCE COMMISSION
DATA REQUEST WD-1.27
DOCKET NO. 01-0606
NOVEMBER 1, 2001
WITNESS RESPONSIBLE: THOMAS J. BUNOSKY

WD-1.27 Please provide all documents, studies, and workpapers utilized by CIWC to propose a 20" dia. transmission main to serve the generating facility.

Answer: The 20" dia. transmission main was selected based on engineering judgement to meet the required fire flows of the system and to fit into the long term plans for the system. The carrying capacity of the 20" main, based on acceptable pressure loss, is estimated to be 4,400 gpm. This carrying capacity is desirable for industrial and commercial areas, as are being developed in University Park. The proposed main will connect to an existing 20" main on the west side of Route 50 so this size fits into the master plan for the transmission main grid system.

CONSUMERS ILLINOIS WATER COMPANY
RESPONSES TO ILLINOIS COMMERCE COMMISSION
DATA REQUEST WD-1.29
DOCKET NO. 01-0606
NOVEMBER 1, 2001
WITNESS RESPONSIBLE: THOMAS J. BUNOSKY

WD-1.28 Please provide a detailed breakdown of the $436,000 for the 20" water transmission main extension to serve the generating plant.

Answer: The detailed cost breakdown of the $436,000 for the 20" water transmission main extension to serve the generating plant is as follows:

TRANSMISSION MAIN COST ESTIMATE
STUENKEL RD - CICERO TO GOVERNOR'S STATE UNIVERSITY
UNIVERSITY PARK, IL

ITEM	QUANTITY	MATERIAL COST	LABOR COST	UNIT COST	EXTENSION
20" DI Water Main (PC 250)	3,600 L.F.	$22.00	$20.00	$42.00	$151,200.00
36" Bore and Encasement	325 L.F.			$300.00	$97,500.00
Bore Pits	4 EA.			$1,500.00	$6,000.00
20" Butterfly Valve	2 EA.	$1,800.00	$300.00	$2,100.00	$4,200.00
20" x 90° SJ Bend	1 EA.	$800.00		$800.00	$800.00
20" x 16" MJ Reducer	1 EA.	$800.00		$800.00	$800.00
Drive Restoration					$10,000.00
Fine Grade Reseed	8000 Sq.Yd.			$1.00	$8,000.00

Construction - Subtotal:	$278,500.00
Engineering @ 10%:	$ 27,850.00
Construction Management @ 5%:	$ 13,925.00
Inspection & Testing @ 5%:	$ 13,925.00
AFDUC @ 5%:	$ 13,925.00
Contingency @ 10%:	$ 27,850.00
Total Project Cost:	**$376,000**
Valve Vault Cost:	**$60,000**
Grand Total:	**$436,000**

CONSUMERS ILLINOIS WATER COMPANY
RESPONSES TO ILLINOIS COMMERCE COMMISSION
DATA REQUEST WD-1.30
DOCKET NO. 01-0606
NOVEMBER 1, 2001
WITNESS RESPONSIBLE: THOMAS J. BUNOSKY

WD-1.30 Please provide a detailed breakdown of the $1,573,000 for the additional supply facilities needed to serve the generating plant.

Answer: The detailed breakdown to the $1,573,000 for the additional supply facilities needed to serve the generating plant is as follows:

WELL NO. 5 UPGRADE

ITEM	QUANTITY		UNIT COST	EXTENSION
Well House		JOB		$ 30,000
Piping in Well House		JOB		$ 20,000
Yard Piping		JOB		$ 30,000
Treatment Equipment		JOB		$ 10,000
Electrical Switchgear		JOB		$ 20,000
Electrical Controls		JOB.		$ 50,000
Well Pump		JOB		$ 50,000
Well Development		JOB		$ 10,000
	Construction - Subtotal:			$ 220,000
	Engineering Design @ 10%:			$ 22,000
	Inspection and Testing @ 5%:			$ 11,000
	Construction Management @ 5%:			$ 11,000
	AFDUC @ 5%:			$ 11,000
	Contingency @ 15%:			$ 33,000
	Total Project Cost:			**$ 308,000**

UP INDUSTRIAL PARK

BOOSTER PUMP COST ESTIMATE

ITEM	AMOUNT
Roof Replacement	$ 10,000
Booster Pumps - Three rated @ 2,000 gpm ea.	$ 40,000
Meter Vault with two 12" propeller meters	$ 25,000
Service Entrance Panel - 600 Amp	$ 5,000
Variable Frequency Drives - Two @ 100 HP ea.	$ 45,000
Combination Motor Starter - 100 HP	$ 5,000
Stanby Generator - 350 KW	$ 75,000
Automatic Transfer Switch	$ 10,000
Programmable Contoller	$ 10,000
Pressure Transducers - two for well and boosters	$ 4,000
Radio Telemetry for pressure monitoring	$ 15,000
Air Conditioning	$ 10,000
Electrical - Software/Programming	$ 30,000
Electrical - Power	$ 20,000
Subtotal - Construction	$ 304,000
Engineering - Design	$ 30,000
- Inspection	$ 10,000
Construction Management:	$ 10,000
Interest During Construction	$ 10,000
Contingency:	$ 36,000
Total Project Costs:	**$ 400,000**

CONSUMERS ILLINOIS WATER COMPANY
RESPONSES TO ILLINOIS COMMERCE COMMISSION
DATA REQUEST WD-1.30
DOCKET NO. 01-0606
NOVEMBER 1, 2001
WITNESS RESPONSIBLE: THOMAS J. BUNOSKY

UP INDUSTRIAL PARK	
1.5MG GROUND STORAGE TANK COST ESTIMATE	
ITEM	**AMOUNT**
Tank and Foundation Including Engineering for same	$700,000
Yard Piping - 700 ft. of 16" DIP	$ 40,000
Control Valves & Piping	$ 30,000
Electrical - Power & Controls	$ 20,000
Subtotal - Construction	$790,000
Engineering - Design	$ 30,000
- Inspection	$ 20,000
Construction Management:	$ 10,000
Interest During Construction	$ 10,000
Contingency:	$ 5,000
Total Project Costs:	**$865,000**

Grand Total (Well, Booster Sta., & Tank): $1,573,000

CONSUMERS ILLINOIS WATER COMPANY
RESPONSES TO ILLINOIS COMMERCE COMMISSION
DATA REQUEST WD-1.33
DOCKET NO. 01-0606
NOVEMBER 1, 2001
WITNESS RESPONSIBLE: THOMAS J. BUNOSKY

WD-1.33 a) Will any of the proposed transmission mains be constructed in farmland?

b) If yes, has CIWC entered in to an Agriculture Impact Mitigation Agreement? If yes, please provide a copy of the agreement.

c) If no, has CIWC contacted the Department of Agriculture concerning the proposed transmission main?

Answer: a) Yes. A portion of the proposed transmission main will be constructed in farmland.

b) Yes, CIWC has entered into an Agriculture Impact Mitigation Agreement. A copy of the Agreement is attached.

EXHIBIT WD-1.33

CONSUMERS
ILLINOIS
WATER COMPANY

KANKAKEE COUNTY OFFICE

October 6, 2000

Mr. James R. Hartwig
Illinois Department of Agriculture
Office of Farmland Protection and
Mined Land Reclamation
State Fairgrounds
P.O. Box 19281
Springfield, IL 62794-9281

Re: Water and Sewer Line Construction Standards and Policies

Dear Mr. Hartwig,

We have reviewed the Water and Sewer Line Construction Standards and Policies, established by the Illinois Department of Agriculture. We understand that these standards and policies will serve to minimize the negative agricultural impacts that may result due to water and sewer line construction. We hereby adopt these standards and policies for all our water and sewer line construction across croplands and pastures in Will County and Kankakee County, IL.

Very truly yours,
CONSUMERS ILLINOIS WATER COMPANY

Thomas J. Bunosky
Vice President/Division Manager

KANKAKEE COUNTY
P.O. Box 153
1000 S. Schuyler Avenue
Kankakee, IL 60901-0152
815.935.8603
Fax: 815.935.8609

WILL COUNTY
P.O. Box 788
24660 S. Western Avenue
University Park, IL 60466-0788
708.534.6513
Fax: 708.534.2623

LEE-BOONE-KNOX COUNTY
5301 East State Street
Suite 217
Rockford, IL 61108
815.229.6601
Fax: 815.229.6709

VERMILION COUNTY
P.O. Box 1130
322 N. Gilbert Street
Danville, IL 61834-1130
217.443.8538
Fax: 217.442.0178

CONSUMERS ILLINOIS WATER COMPANY
RESPONSES TO ILLINOIS COMMERCE COMMISSION
DATA REQUEST WD-1.37
DOCKET NO. 01-0606
NOVEMBER 1, 2001
WITNESS RESPONSIBLE: THOMAS J. BUNOSKY

WD-1.37 Please explain how the accounting treatment would be handled for the proposed main extension.

Answer: LSDG will deposit funding for the main extension project into an escrow account. As a vendor invoice becomes due, either singularly or in a batch depending on the timing and materiality of any outstanding invoices, Consumers Illinois Water Company will draw from the escrow account to pay the currently due invoices(s). At this time, the amount drawn will be recorded on CIWC's ledger as follows:

	Debit	Credit
Cash	XX	
Contributions-In-Aid of Construction		XX

With the payment of each invoice for the project recorded as follows:

CWIP (Project #)	XX	
Cash		XX

This process will continue until the projects completed, at which time the amount in CWIP will be closed to Plant In Service.

CONSUMERS ILLINOIS WATER COMPANY
RESPONSES TO ILLINOIS COMMERCE COMMISSION
DATA REQUEST WD-1.39
DOCKET NO. 01-0606
NOVEMBER 1, 2001
WITNESS RESPONSIBLE: THOMAS J. BUNOSKY

WD-1.39 Please provide all documents, studies, and work papers utilized by CIWC to determine why recapture payments should be limited only to customers connecting to the proposed main extensions, where use is 100 gallons or more within 10 years.

Answer: LSDG requested during the negotiations of the Water Supply Agreement that future "large" water usage customers be charged a recapture fee based on the percentage of use of the main extension since this main extension was being oversized to accommodate future customers needs. The main extension is connecting the two separate water systems of the University Park Division. Since this main connection enables the two systems to become one system, both systems become more reliable with greater water supply capacity than two stand-alone water systems. All current and future customers will therefore benefit from this connection sized to not only meet the needs of LSDG, but the needs of current and future customers also. LSDG, however, did not want to require that future residential or small commercial customer provide a Contribution-In-Aid-Of-Construction for the Main or Supply Facilities. LSDG, however, was concerned that a second Power Plant owned by a competitor of LSDG would be proposed in this same area (Exhibit C – Village of University Park's Industrial Park) after these facilities were constructed. This second Power Plant would be able to obtain water service to meet their needs without having to pay for any of the facilities constructed by LSDG since the system will have excess capacity constructed. This would then make the LSDG facility less efficient then their competitor based on the difference in the capital outlay for water service to construct the respective facilities. It was agreed that a potential power plant would have water usage needs in excess of 100 gpm and therefore both parties agreed upon the 100-gpm level. In an effort to not discriminate against any one type of customer due to their particular use of the water, it was agreed to include any customer who would have a need for 100 gpm or greater flow requirements that was locating within the University Park's Industrial Park as designated in Exhibit C. These customers would be subject to this recapture fee since their flow requirement could be met without constructing any additional facilities. Any customer locating within this area and having this large of a flow requirement is made possible by this main extension that connects the two systems.